

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JENNIFER LEE CURTIS,

INDICTMENT

Defendant.

/

The Grand Jury charges:

COUNT 1
(Distribution of Child Pornography)

On or about July 16, 2022, in Baraga County, in the Northern Division of the
Western District of Michigan, Defendant,

JENNIFER LEE CURTIS,

knowingly distributed child pornography using any means or facility of interstate or
foreign commerce; that is, Defendant used her Wickr account with username
“babylotr” to send to user “libastorm” videos that constitute child pornography,
including, but not limited to, the following video file identified by the filename as
uploaded on Wickr:

a. b5466d7a-6bf3-40c2-b563-82fd0eb5c7dd.mp4.

18 U.S.C. § 2252A(a)(2), (b)(1)
18 U.S.C. § 2256(8)(A)

COUNT 2
(Distribution of Child Pornography)

On or about July 16, 2022, in Baraga County, in the Northern Division of the Western District of Michigan, Defendant,

JENNIFER LEE CURTIS,

knowingly distributed child pornography using any means or facility of interstate or foreign commerce; that is, Defendant used her Wickr account with username “babylotr” to send to user “legshaker69” videos that constitute child pornography, including, but not limited to, the following video file identified by the filename as uploaded on Wickr:

- a. 365643cd-f4e6-4e08-b4d4-a720d17a7d99.mp4.

18 U.S.C. § 2252A(a)(2), (b)(1)
18 U.S.C. § 2256(8)(A)

COUNT 3
(Distribution of Child Pornography)

On or about July 18, 2022, in Baraga County, in the Northern Division of the Western District of Michigan, Defendant,

JENNIFER LEE CURTIS,

knowingly distributed child pornography using any means or facility of interstate or foreign commerce; that is, Defendant used her Wickr account with username “babylotr” to send to user “tugmeoff01” the following video, identified by its filename as uploaded on Wickr and which constitutes child pornography:

- a. b3dd86ab-81a7-4a60-b4da-41069559afa1.mp4.

18 U.S.C. § 2252A(a)(2), (b)(1)

18 U.S.C. § 2256(8)(A)

COUNT 4
(Distribution of Child Pornography)

On or about July 18, 2022, in Baraga County, in the Northern Division of the Western District of Michigan, Defendant,

JENNIFER LEE CURTIS,

knowingly distributed child pornography using any means or facility of interstate or foreign commerce; that is, Defendant used her Wickr account with username “babylotr” to send to user “legshaker69” videos that constitute child pornography, including, but not limited to, the following video file identified by the filename as uploaded to Wickr:

- a. 638b44be-c239-40e1-a7d8-a0eb62b5a8ab.mp4.

18 U.S.C. § 2252A(a)(2), (b)(1)
18 U.S.C. § 2256(8)(A)

COUNT 5
(Possession of Child Pornography)

On or about July 19, 2022, in Baraga County, in the Northern Division of the Western District of Michigan, Defendant,

JENNIFER LEE CURTIS,

knowingly possessed child pornography depicting prepubescent minors, including, but not limited to, one or more of the following images and videos listed by filename:

- a. 1_5066666708844937834.mp4;
- b. -5019578542837465600_1109.jpg;
- c. -5026055039987221254_1109.jpg; and
- d. -2147483648_-210012.mp4.

Such images and videos were produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including, but not limited to, a Samsung Galaxy A21 cellphone with serial number R9AN80K3RDJ with components that were manufactured outside the state of Michigan.

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

(Distribution of Child Pornography and Possession of Child Pornography)

The allegations contained in Counts 1-5 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253(a).

Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. § 2252A set forth in Counts 1-5 of this Indictment, Defendant,

JENNIFER LEE CURTIS,

shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses and any property traceable to such property, including but not limited to the following:

- a. Samsung Galaxy A21 cellphone with serial number R9AN80K3RDJ.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 2253(b).

18 U.S.C. § 2253(a), (b)

21 U.S.C. § 853(p)

18 U.S.C. § 2252A

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



THEODORE J. GREELEY
Assistant United States Attorney